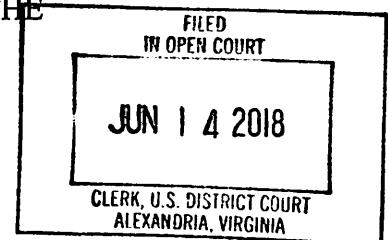


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA)
v.) Criminal No. 1:18-CR-236
KEITH ANDRE HADDOCK II,)
a.k.a. "Keith Haddock,")
a.k.a. "Frank,")
a.k.a. "Frank White,")
(Counts 1-7))
BRITTANY NICOLE BLANKEN,)
(Counts 1, 6 and 7))
and)
RONALD LEE BLANKEN III,)
(Counts 1 and 7))
Defendants.)

June 2018 Term – at Alexandria

SUPERSEDING INDICTMENT

COUNT ONE

(Conspiracy to Make False Statements in Connection with Firearms Transactions)

THE GRAND JURY CHARGES THAT:

General Allegations

At all times relevant to Count One of this Indictment:

1. Defendant KEITH ANDRE HADDOCK II resided in the District of Columbia and Maryland.
2. Defendant BRITTANY NICOLE BLANKEN resided in the District of Columbia and

Maryland.

3. Defendant RONALD LEE BLANKEN III and an unindicted co-conspirator resided together in Virginia.

4. A person purchasing firearms from a federal firearms licensee (“FFL”) is required to complete an ATF Form 4473 (“Form 4473”) and certify that he or she is the purchaser of the firearm and the firearm is not being acquired on behalf of someone else.

Conspiracy

From on or about December 3, 2017, and continuing through on or about January 6, 2018, within the Eastern District of Virginia and elsewhere, the defendants, KEITH ANDRE HADDOCK II, BRITTANY NICOLE BLANKEN, and RONALD LEE BLANKEN III, did knowingly and unlawfully combine, conspire, agree, and confederate with each other and others, known and unknown to the Grand Jury, to knowingly make false statements and representations with respect to the information required to be kept in the records of a licensed gun dealer in connection with the sale of firearms, in violation of Title 18, United States Code, Section 924(a)(1)(A).

Object of the Conspiracy

The object of the conspiracy was to purchase firearms from FFLs in Virginia for individuals who did not reside in Virginia.

Manner and Means of the Conspiracy

The manner and means by which the members of the conspiracy conducted the conspiracy included the following:

1. It was part of the conspiracy that members of the conspiracy who resided in Virginia

would attend gun shows and visit gun stores, within the Eastern District of Virginia, to purchase firearms from FFLs for defendants who did not reside in Virginia.

2. It was further part of the conspiracy that the defendants who did not reside in Virginia would identify specific firearms that the members of the conspiracy who resided in Virginia should purchase at gun shows and gun stores in the Eastern District of Virginia.

3. It was further part of the conspiracy that the defendants who did not reside in Virginia would drive by vehicle from Maryland and the District of Columbia to Virginia to pick-up the members of the conspiracy who resided in Virginia and drive them to gun shows and gun stores in the Eastern District of Virginia to purchase firearms from FFLs.

4. It was further part of the conspiracy that the defendants who did not reside in Virginia would accompany the members of the conspiracy who resided in Virginia inside gun shows and gun stores to purchase firearms from FFLs.

5. It was further part of the conspiracy that a defendant who did not reside in Virginia would provide money to the members of the conspiracy who resided in Virginia to purchase firearms from FFLs.

Overt Acts

In furtherance of the conspiracy and to effect the object of the conspiracy, the defendants and an unindicted co-conspirator did commit, among others, the following overt acts in the Eastern District of Virginia and elsewhere:

1. On or about December 3, 2017, the defendants and an unindicted co-conspirator drove to a Gun Show in Manassas, Virginia, within the Eastern District of Virginia, to purchase a firearm from an FFL for KEITH ANDRE HADDOCK II and BRITTANY NICOLE BLANKEN.

2. On or about December 3, 2017, at the Gun Show in Manassas, Virginia, KEITH ANDRE HADDOCK II provided the unindicted co-conspirator with cash to purchase a Charles Daly Defense, model PAK-9, 9 mm pistol from First Strike Munitions, an FFL located in Fredericksburg, Virginia.

3. On or about December 9, 2017, the defendants and an unindicted co-conspirator drove to the Meadow Event Park Gun Show in Caroline County, Virginia, within the Eastern District of Virginia, to purchase firearms from an FFL for KEITH ANDRE HADDOCK II and BRITTANY NICOLE BLANKEN.

4. On or about December 9, 2017, at the the Meadow Event Park Gun Show in Caroline County, Virginia, KEITH ANDRE HADDOCK II provided the unindicted co-conspirator with cash to purchase one Springfield Armory, model XD MOD.2, .45 caliber pistol, one Springfield Armory, model XDS, 9 mm pistol, two Taurus, model PT111 G2, 9 mm pistols, and one SCCY Industries, Model CPX-1, 9 mm pistol from Trojan Arms & Tactical, an FFL located in Manassas, Virginia.

5. On or about December 16, 2017, at least two of the defendants, including KEITH ANDRE HADDOCK II and BRITTANY NICOLE BLANKEN, and an unindicted co-conspirator, drove to the Fredericksburg Gun Show in Fredericksburg, Virginia, within the Eastern District of Virginia, to purchase firearms from FFLs for KEITH ANDRE HADDOCK II and BRITTANY NICOLE BLANKEN.

6. On or about December 16, 2017, at the Fredericksburg Gun Show in Fredericksburg, Virginia, KEITH ANDRE HADDOCK II provided the unindicted co-conspirator with cash to purchase one Springfield Armory, model XDS, .40 caliber pistol, one Taurus, model PT111 G2, 9

mm pistol, and one Smith & Wesson, model SD40, .40 caliber pistol, from CK3 Guns and Patriot Services, FFLs located in Stephens City and Richmond, Virginia.

7. On or about December 17, 2017, at least two of the defendants, including KEITH ANDRE HADDOCK II and BRITTANY NICOLE BLANKEN, and an unindicted co-conspirator, drove to the Fredericksburg Expo Gun Show in Fredericksburg, Virginia, within the Eastern District of Virginia, to purchase firearms from an FFL for KEITH ANDRE HADDOCK II and BRITTANY NICOLE BLANKEN.

8. On or about December 17, 2017, at the Fredericksburg Expo Gun Show in Fredericksburg, Virginia, KEITH ANDRE HADDOCK II provided the unindicted co-conspirator with cash to purchase one Taurus, model PT111 G2, 9 mm pistol, one Smith & Wesson, model M&P 40 Shield, .40 caliber pistol, and one Diamondback Firearms, model DB15, .223/5.56 caliber rifle, from Trojan Arms & Tactical, an FFL located in Manassas, Virginia.

9. On or about December 24, 2017, at least two of the defendants and an unindicted co-conspirator drove to Trojan Arms & Tactical, a FFL located in Manassas, Virginia, within the Eastern District of Virginia, to purchase firearms from the FFL for KEITH ANDRE HADDOCK II and BRITTANY NICOLE BLANKEN.

10. On or about December 24, 2017, inside Trojan Arms & Tactical in Manassas, Virginia, KEITH ANDRE HADDOCK II provided the unindicted co-conspirator with cash to purchase one Smith & Wesson, model M&P 40 Shield, .40 caliber pistol, and one Springfield Armory, model XD, .45 caliber pistol.

11. On or about December 26, 2017, at least two of the defendants and an unindicted co-

conspirator drove to Trojan Arms & Tactical, an FFL located in Manassas, Virginia, within the Eastern District of Virginia, to purchase firearms from the FFL for KEITH ANDRE HADDOCK II and BRITTANY NICOLE BLANKEN.

12. On or about December 26, 2017, inside Trojan Arms & Tactical in Manassas, Virginia, KEITH ANDRE HADDOCK II provided the unindicted co-conspirator with cash to purchase one Smith & Wesson, model M&P 40C, .40 caliber pistol, and one Glock, model 27 GEN 4, .40 caliber pistol.

13. On or about December 28, 2017, the defendants and an unindicted co-conspirator drove to 50 West Armory, an FFL located in Chantilly, Virginia, within the Eastern District of Virginia, to purchase firearms from the FFL for KEITH ANDRE HADDOCK II and BRITTANY NICOLE BLANKEN.

14. On or about December 28, 2018, at 50 West Armory in Chantilly, Virginia, KEITH ANDRE HADDOCK II provided RONALD LEE BLANKEN III with cash to purchase one Springfield Armory, model XDS, 9 mm pistol, one Glock, model 30, .45 caliber pistol, and one Smith & Wesson, model M&P 40 Shield, .40 caliber pistol.

15. On or about December 30, 2017, the defendants and an unindicted co-conspirator drove to the Nation's Gun Show in Chantilly, Virginia, within the Eastern District of Virginia, to purchase firearms from FFLs for KEITH ANDRE HADDOCK II and BRITTANY NICOLE BLANKEN.

16. On or about December 30, 2017, at the Nation's Gun Show in Chantilly, Virginia, KEITH ANDRE HADDOCK II provided RONALD LEE BLANKEN III with cash to purchase one Springfield Armory, model XD40, .40 caliber pistol, one Chiappa Firearms, model M-Four-

22, .22 LR pistol, and one Zastava, model PAPM92PV, 7.62x39 mm pistol, from Sonny's Guns and Transfers and Saddle Ridge Armory, FFLs located in Richmond and Catlett, Virginia.

17. On or about December 31, 2017, the defendants and an unindicted co-conspirator drove to the Nation's Gun Show in Chantilly, Virginia, within the Eastern District of Virginia, to purchase firearms from FFLs for KEITH ANDRE HADDOCK II and BRITTANY NICOLE BLANKEN.

18. On or about December 31, 2017, at the Nation's Gun Show in Chantilly, Virginia, KEITH ANDRE HADDOCK II provided RONALD LEE BLANKEN III with cash to purchase one Anderson Manufacturing, model AM15, 5.56 caliber pistol, and one Glock, model 22, .40 caliber pistol, from Sonny's Guns and Transfers and Rabbit Ridge Enterprises, FFLs located in Richmond and Ararat, Virginia.

19. On or about January 6, 2018, the defendants and an unindicted co-conspirator drove to the Dale City Gun Show in Dale City, Virginia, within the Eastern District of Virginia, to purchase firearms from FFLs for KEITH ANDRE HADDOCK II and BRITTANY NICOLE BLANKEN.

20. On or about January 6, 2018, at the Dale City Gun Show in Dale City, Virginia, KEITH ANDRE HADDOCK II provided RONALD LEE BLANKEN III with cash to purchase two Smith & Wesson, model M&P 40 Shield M2.0, .40 caliber pistols, and one Century Arms, model RAS47 AK, 7.62x39 mm rifle, from DK Firearms and Roderick Bulley, FFLs located in Bowling Green and Winchester, Virginia.

(All in violation of Title 18, United States Code, Section 371.)

COUNT TWO

(Possession of a Firearm by a Felon)

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 7, 2017, in Fairfax County, Virginia, within the Eastern District of Virginia, defendant KEITH ANDRE HADDOCK II, having been convicted of crimes punishable by imprisonment for a term exceeding one year, specifically conspiracy to commit robbery and first degree assault in the Circuit Court of Montgomery County, Maryland, did knowingly and intentionally possess the following firearm in and affecting interstate commerce: a pistol bearing serial number KDV3793.

(In violation of Title 18, United States Code, Section 922(g)(1).)

COUNT THREE

(Possession of a Firearm by a Felon)

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 9, 2017, in Caroline County, Virginia, within the Eastern District of Virginia, defendant KEITH ANDRE HADDOCK II, having been convicted of crimes punishable by imprisonment for a term exceeding one year, specifically conspiracy to commit robbery and first degree assault in the Circuit Court of Montgomery County, Maryland, did knowingly and intentionally possess the following five (5) firearms in and affecting interstate commerce: a Springfield Armory, model XD MOD.2, .45 caliber pistol; a Springfield Armory, model XDS, 9 mm pistol; two Taurus, model PT111 G2, 9 mm pistols; and a SCCY Industries, Model CPX-1, 9 mm pistol.

(In violation of Title 18, United States Code, Section 922(g)(1).)

COUNT FOUR

(Possession of a Firearm by a Felon)

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 26, 2017, in Manassas, Virginia, within the Eastern District of Virginia, defendant KEITH ANDRE HADDOCK II, having been convicted of crimes punishable by imprisonment for a term exceeding one year, specifically conspiracy to commit robbery and first degree assault in the Circuit Court of Montgomery County, Maryland, did knowingly and intentionally possess the following two (2) firearms in and affecting interstate commerce: a Glock, model 27 Gen 4, .40 caliber pistol; and a Smith & Wesson, model M&P 40C, .40 caliber pistol.

(In violation of Title 18, United States Code, Section 922(g)(1).)

COUNT FIVE

(Possession of a Firearm by a Felon)

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 6, 2018, in Dale City, Virginia, within the Eastern District of Virginia, defendant KEITH ANDRE HADDOCK II, having been convicted of crimes punishable by imprisonment for a term exceeding one year, specifically conspiracy to commit robbery and first degree assault in the Circuit Court of Montgomery County, Maryland, did knowingly and intentionally possess the following firearm in and affecting interstate commerce: a Century Arms, model RAS47 AK, 7.62x39 mm rifle.

(In violation of Title 18, United States Code, Section 922(g)(1).)

COUNT SIX

(False Statements to a Federal Firearms Licensee)

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 9, 2017, in Caroline County, Virginia, within the Eastern District of Virginia, defendants KEITH ANDRE HADDOCK II and BRITTANY BLANKEN, in connection with the acquisition of a Springfield Armory, model XD MOD.2, .45 caliber pistol, a Springfield Armory, model XDS, 9 mm pistol, two Taurus, model PT111 G2, 9 mm pistols, and a SCCY Industries, Model CPX-1, 9 mm pistol, from Trojan Arms & Tactical, did knowingly aid and abet the making of a false statement and representation with respect to the information required by Chapter 44 of Title 18, United States Code, to be kept in the records of a licensed firearms dealer in connection with the sale of firearms; namely, KEITH ANDRE HADDOCK II provided an unindicted co-conspirator with money to purchase the firearms, and KEITH ANDRE HADDOCK II and BRITTANY BLANKEN knew the unindicted co-conspirator falsely represented that she was the actual buyer of the firearms, when, in fact, each firearm was purchased on behalf of KEITH ANDRE HADDOCK II and BRITTANY BLANKEN.

(In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.)

COUNT SEVEN

(False Statements to a Federal Firearms Licensee)

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 6, 2018, in Dale City, Virginia, within the Eastern District of Virginia, the defendants, RONALD LEE BLANKEN, KEITH ANDRE HADDOCK II, and BRITTANY NICOLE BLANKEN, in connection with the acquisition of two Smith & Wesson, model M&P 40 Shield M2.0, .40 caliber pistols, and a Century Arms, model RAS 47 AK, 7.62x39 mm rifle, from DK Firearms and Roderick Bulley, did knowingly make, and aid and abet the making of, false statements and representations with respect to the information required by Chapter 44 of Title 18, United States Code, to be kept in the records of two licensed firearms dealers in connection with the sale of firearms; namely, KEITH ANDRE HADDOCK II provided RONALD LEE BLANKEN with money to purchase the firearms, and KEITH ANDRE HADDOCK II and BRITTANY BLANKEN knew RONALD LEE BLANKEN falsely represented that he was the actual buyer of the firearms, when, in fact, each firearm was purchased on behalf of KEITH ANDRE HADDOCK II and BRITTANY BLANKEN.

(In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.)

FORFEITURE NOTICE

THE GRAND JURY FURTHER FINDS that there is probable cause that the property described below is subject to forfeiture. Pursuant to Rule 32.2(a), the defendants are hereby notified that, if convicted, the defendants shall forfeit to the United States all firearms and ammunition involved in or used in such violation. This property includes, but is not limited to, the following:

- a) One Charles Daly Defense, model PAK-9, 9 mm pistol, bearing serial number RONVMB71707089;
- b) Four Taurus, model PT111 G2, 9 mm pistols, bearing serial numbers TKT80936, TKT80942, TKT02098, and TKW04712;
- c) One SCCY Industries LLC, model CPX-1, 9 mm pistol, bearing serial number 600323;
- d) Two Springfield Armory, model XD MOD.2, .45 caliber pistols, bearing serial numbers GM470551 and GM470546;
- e) Two Springfield Armory, model XDS, 9 mm pistols, bearing serial numbers S4950299 and S3609035;
- f) One Smith & Wesson, model SD40, .40 caliber pistol, bearing serial number FZD3114;
- g) One Springfield Armory, model XDS, .40 caliber pistol, bearing serial number S3511656;
- h) Two Smith & Wesson, model M&P 40 Shield, .40 caliber pistols, bearing serial numbers HYB0934 and HDN0598;
- i) One Diamondback Firearms, model DB15, .223/5.56 caliber rifle, bearing serial number DB1726050;

- j) One Smith & Wesson, model M&P 40, .40 caliber pistol, bearing serial number HYB0949;
- k) One Glock, model 27 GEN 4, .40 caliber pistol, bearing serial number BEDR450;
- l) One Smith & Wesson, model M&P 40C, .40 caliber pistol, bearing serial number HWD3206;
- m) One Glock, model 30, .45 caliber pistol, bearing serial number BCYN171;
- n) One Springfield Armory, model XD40, .40 caliber pistol, bearing serial number US485362;
- o) One Anderson Manufacturing, model AM15, 5.56 caliber pistol, bearing serial number 17150819;
- p) One Chiappa Firearms, model M-Four-22, .22 LR pistol, bearing serial number 13A37015;
- q) One Zastava, model PAPM92PV, 7.62x39 mm pistol, bearing serial number M92PV069329;
- r) One Glock, model 22, .40 caliber pistol, bearing serial number BART825;
- s) Two Smith & Wesson, model M&P 40 Shield M2.0, .40 caliber pistol, bearing serial numbers HYX9666 and HYT5784;
- t) One Century Arms, model RAS47 AK, 7.62x39 mm rifle, bearing serial number RAS47087909.

(Pursuant to Federal Rule of Criminal Procedure 32.2 and Title 18, United States Code Section § 924(d).)

A TRUE BILL

Pursuant to the U. S. Government Act,
the original of this page has been filed
under seal in the Clerk's Office.

FOREPERSON

G. Zachary Terwilliger
United States Attorney

By:

Stephanie Williamson
Stephanie Williamson
Special Assistant United States Attorney
Nicholas U. Murphy
Assistant United States Attorney